
Los Angeles Regional Water Quality Control Board

August 3, 2018

Mr. Kevin Brown, General Manager
City of Ventura - Ventura Water
P.O. Box 99
Ventura, CA 93002-0099

Dear Mr. Brown,

INCOMPLETE REPORT OF WASTE DISCHARGE (ROWD) FOR NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT – CITY OF VENTURA, VENTURA WATER RECLAMATION FACILITY (ORDER NO. R4-2013-0174, NPDES NO. CA0053651, CI NO. 1822)

On July 5, 2018, the Los Angeles Regional Water Quality Control Board (Regional Water Board) received a Report of Waste Discharge (ROWD) for renewal of the National Pollutant Discharge Elimination System (NPDES) permit for the Ventura Water Reclamation Facility (VWRF) Order No. R4-2013-0174. We have reviewed the information submitted in United States Environmental Protection Agency (USEPA) Forms 1 and 2A and determined that the ROWD is incomplete.

To allow timely completion of a tentative permit, please submit the information listed below.

- 1) USEPA Form 1, Section X and USEPA Form 2A, Part A.3 - Existing Environmental Permits: Add the State Water Board's Stormwater Industrial General Permit, Order No. 2014-0057-DWQ.
- 2) USEPA Form 1, Section V - Facility Area and Facility Site Map: Provide clearer location maps of the area, the permitted facility, of the facility footprint, receiving water stations and a detail of the wildlife ponds and outfall in pdf format for direct inclusion in the Order.
- 3) USEPA Form 2A, Part A.4 - Collection System Information: Provide a map of the service area/collection system.
- 4) USEPA Form 2A, Part A.9.b - Description of Outfall: Provide the latitude and longitude coordinates in decimal form rather than in minutes and seconds for all existing and proposed effluent and receiving water locations in the current Order.
- 5) USEPA Form 2A, Part A.9.e - Other Disposal: Include the average annual daily volume of disposal through the recycled water mobile hauling program.
- 6) USEPA Form 2A, Part A.10.d - Description of Receiving Waters: Add a discussion of acute and chronic critical low flow conditions from the Phase Three Estuary Studies assuming there is no discharge from the treatment plant.
- 7) USEPA Form 2A, Part B.3 - Process Flow Diagram:

MADRYN CLEVERFIELD, CHAIR | SAMUEL UNDER, EXECUTIVE OFFICER

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- a. Add an aerial figure and label the major treatment units and components;
 - b. Include the overall mass balance indicating the flows into and out of the VWRP, as well as the mass balance into and out of each of the major treatment processes within the plant, in units of million gallons per day (MGD);
 - c. Expand the narrative description accompanying the process flow diagram, to discuss the various treatment processes and the flows (influent, effluent, product recycled waters, process streams, etc.);
 - d. Include a list of facility or operational changes that were completed after the adoption of R4-2013-0094, and
 - e. Include any modification or improvement made to the treatment process.
- 8) USEPA Form 2A, Part B.6: Include water quality data for these conventional and non-conventional pollutant: settleable solids, organic nitrogen, and total nitrogen.
- 9) USEPA Form 2A, Part D - Expanded Effluent Testing Data: Include water quality data for these pollutants sums which are not included in the ROWD or reported to CIWQS.
- a. Endosulfan (sum of -alpha, -beta, and -sulfate)
 - b. Halomethanes (sum of bromoform, bromodichloromethane, chloroform, and dibromochloromethane).
 - c. HCH (sum of alpha, beta, gamma (lindane) and delta isomers of hexachlorocyclohexane)
 - d. PAHs (polynuclear aromatic hydrocarbons)
 - e. PCBs (polychlorinated biphenyls)
 - f. Pesticides - DDT sum, aldrin, chlordane, endrin, heptachlor, heptachlor epoxide, toxaphene.
 - g. Per- and polyfluoroalkyl substances (PFAS), PFOA or PFOS (if sampled)
- 10) USEPA Form 2A, Part E- Expanded Toxicity Testing Data: Please include water quality data sampled within the collection system by the City or by an industry, for the following pollutants which may cause or contribute to toxicity or an exceedance of a water quality criteria in the effluent: arsenic, 1,3-dichloropropylene, chlordane, 4-DDT, pentachlorophenol sum, heptachlor epoxide, toxaphene, ammonia, nitrate, nitrite, copper, selenium, nickel and lead.
- 11) USEPA Form 2, Part B.1 Inflow: The change in inflow/infiltration from 562,800 to 37,000 GPD is large and is here attributed to sewer line replacements and repairs. Please estimate if there would be any future changes in inflow for the next five years for use in predicting treatment performance during the term of the reissued permit.

The CIWQS data through September 2014 has been validated by Regional Water Board staff against paper reports. Because the City does not yet have written permission to submit monitoring data electronically, the CIWQS report of the effluent data from January 2014 to December 2018 will be used for the preparation of the revised Order only where the City does not submit revisions or additions as part of the ROWD. Please verify the maximum concentrations and most recent minimum detection levels submitted electronically for all

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constituents that are found in EPA Form 2A and those that are limited by the California Toxics Rule.

Please submit the requested items as soon as possible, but no later than September 4, 2018. The Regional Water Board staff will contact you at a future date, following receipt of the supplemental information, or schedule a meeting to address issues associated with the NPDES permit renewal. Tentative waste discharge requirements will be prepared for your discharge and will be considered by this Regional Water Board at a future Board meeting. You will be sent a copy of the tentative requirements and an agenda notice prior to that meeting.

If you have any questions or comments, please contact me at (213) 620-2083 or Elizabeth Erickson at (213) 576-6665.

Sincerely,



Cris Morris, P.E., Chief
Watershed Regulatory Section

cc:

Kurt Souza, Division of Drinking Water
Jeff Densmore, Division of Drinking Water
Environmental Protection Agency, Region 9, Permits Branch (WTR-5)
NOAA, National Marine Fisheries Service
Department of Interior, U.S. Fish and Wildlife Service
David Coupe, State Water Resources Control Board, Office of Chief Counsel
State Water Resources Control Board
State Water Resources Control Board, Division of Drinking Water
Department of Fish and Game, Region 5
California State Parks and Recreation
State Coastal Conservancy
California Coastal Commission, South Coast Region
Ventura County, Department of Environmental Health
City of Los Angeles, Bureau of Sanitation
Los Angeles County Sanitation Districts
Thien Ng, City of Oxnard
Ventura Coast Keeper
Wishtoyo Foundation
Heal the Bay
Environment Now
Natural Resources Defense Council
U.S. Army Corps of Engineers
Los Angeles County Department of Public Works
Los Angeles Waterkeeper
NRDC
Surfrider Foundation